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January 11, 2018

Via Hand Delivery and CM, RRR

Mr. James Lawrence, Assistant Area Director
U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
17625 El Camino Real, Ste. 400
Houston, Texas 77058

Re: T&T Offshore, Inc.

Mr. Lawrence:

Enclosed please find T&T Offshore, Inc.'s objections and responses to the document entitled *Subpoena Duces Tecum* (dated January 3, 2018), as well as, documents Bates Labeled T&T Offshore 000079-000508.

Best regards,

A handwritten signature in black ink, appearing to read "Collin G. Warren".

Collin G. Warren

cc: Mr. Mark Briggs, Area Director
U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
17625 El Camino Real, Ste. 400
Houston, Texas 77058

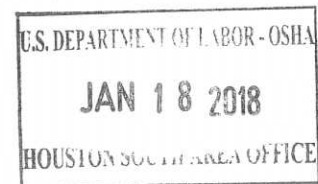
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GENERAL OBJECTIONS TO DOCUMENT ENTITLED SUBPOENA DUCES TECUM

The *Subpoena Duces Tecum* (dated January 3, 2018) is defective in that it does not reference an OSHA inspection number and was not served in accordance with the applicable rules of procedure. Furthermore, the scope of the *Subpoena Duces Tecum*, i.e., the “working conditions maintained by T&T Offshore, Inc. . . .” is overbroad and is thus unreasonable and not compliant with the express terms of the Occupational Safety and Health Act. In light of the above, the purported *Subpoena Duces Tecum* is defective creating no obligation for T&T Offshore, Inc. to respond. T&T Offshore, Inc. further objects to the extent any request seeks to violate or otherwise infringe upon T&T Offshore, Inc.’s rights – and the rights of any employee – afforded under the 5th Amendment to the United States Constitution and Article 1, Section 10 of the Constitution of the State of Texas. Nonetheless, noting those defects and reserving those objections and assertions of privilege, along with its prior notice to OSHA regarding FOIA exemptions, and in an effort to fully cooperate with OSHA during this investigation, T&T Offshore, Inc. responds below subject to and without waiving the objections stated herein.

RESPONSE TO DOCUMENT ENTITLED SUBPOENA DUCES TECUM

1. Any and all personnel records for Jeffrey [sic] Tinney including, but not limited to, application for employment, all disciplinary actions and training records.

Response: T&T Offshore, Inc. objects as above request is overly broad. Specifically, the above request seeks the production of documents that are outside the scope of the investigation, that are unrelated and/or have no connection with OSHA’s investigation (or jurisdiction), that are redundant of prior requests, and that violate the employee’s privacy rights and expectations. As such, the above request is unreasonable as it seeks to impermissibly expand the scope of the inspection. Furthermore, the above request is poorly constructed making the request unclear, vague, ambiguous and subject to being second guessed by OSHA. Subject to and without waiving the foregoing objections and assertions of privilege, and as T&T Offshore, Inc. understands this request, see documents previously produced to OSHA and the documents attached hereto (T&T Offshore 000o79 to 000508). T&T Offshore, Inc. reserves the right to supplement this response should the request be clarified and/or if additional responsive documents are identified/located.

2. Any and all disciplinary records for any employee working for T&T Offshore Inc. for violating a safety and health rule for the company for the period from September 20, 2014 to September 20, 2017.

Response: T&T Offshore, Inc. objects as the above request is overly broad. Specifically, the above request seeks the production of documents: (a) for an unreasonable and overly broad period of time (i.e., three years); (b) that are outside the scope of the inspection (e.g., disciplinary records for *any* rule violation); (c) that are unrelated and/or have no connection with OSHA’s investigation (i.e., have no connection with the incident and/or work); and (d) seeks information about individuals who have no connection to the incident and/or work that is the subject of OSHA’s investigation (e.g., that may not have been employed by T&T Offshore, Inc. at any relevant time and/or that had no connection with the incident under

investigation). As such, the above request is unreasonable as it seeks to impermissibly expand the scope of the inspection and seeks the production of documents that are wholly unrelated to the incident and/or investigation. Furthermore, the above request is poorly constructed making the request unclear, vague, ambiguous and subject to being second guessed by OSHA. T&T Offshore, Inc. reserves the right to supplement this response should the request be clarified and/or if responsive documents are identified/located.

3. If not identified in response to Request No. 1, any and all documents reflecting how long Jeffrey [sic] Tinney has worked for T&T Offshore, Inc.

Response: T&T Offshore, Inc. objects as the above request is redundant and duplicative of prior requests. Subject to and without waiving the foregoing objections, and as T&T Offshore, Inc. understands this request, see documents attached hereto as T&T Offshore 00079 to 000508. T&T Offshore, Inc. reserves the right to supplement this response should the request be clarified and/or if additional responsive documents are identified/located.

4. Any and all documents showing the names, job titles, addresses and/or telephone numbers of employees working for T&T Offshore Inc. between September 20, 2016 and September 20, 2017. Such document(s) need only show employees reporting to work at the facility.

Response: T&T Offshore, Inc. objects as the above request does not seek the production of a specific document or category of documents. T&T Offshore, Inc. further objects as the wording of the above request is overly broad as it seeks the production of documents: (a) that are outside the scope of the inspection; (b) about individuals wholly unrelated to the investigation/incident/work; (c) about individuals who have no connection with the investigation/incident/work; and (d) for an unreasonable and overly broad period of time. As such, the above request is unreasonable and seeks to impermissibly expand the scope of the inspection. Furthermore, the above request is poorly constructed making the request unclear, vague, ambiguous and subject to being second guessed by OSHA. Subject to and without waiving the foregoing objections and assertions of privilege, and as T&T Offshore, Inc. understands the above request, no such documents containing the above information have been identified. However, in an effort to fully cooperate with OSHA during this investigation, and based on the representations made by OSHA as to why this information is needed (to determine the total number of individuals at the facility), T&T Offshore, Inc. provides the following information, although under no obligation to do so:

Phil Leasure
Jerri R.
Jeffery Tinney
Randy S.
Daniel M.
Adrian M.
Christopher S.
Paul S.
Frank K.
Joshua E.

Pedro M.

Dated: January 11, 2018

Respectfully submitted,

FISHER & PHILLIPS LLP

By: /s/ Collin G. Warren
Collin G. Warren
FISHER & PHILLIPS LLP
910 Louisiana Street, Suite 4000
Houston, Texas 77002
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Facsimile: (713) 292-0151
cwarren@fisherphillips.com

Name	Business Title	Hire Date	Street 1
B[REDACTED],MICHAEL [REDACTED]	[REDACTED]	8/7/2015	[REDACTED]
B[REDACTED],CHARLIE	[REDACTED]	2/10/2016	[REDACTED]
C[REDACTED],DAVID [REDACTED]	[REDACTED]	11/18/2016	[REDACTED]
E[REDACTED],JOSHUA	[REDACTED]	11/25/2016	[REDACTED]
H[REDACTED],COBY [REDACTED]	[REDACTED]	8/21/2015	[REDACTED]
K[REDACTED],Frank [REDACTED]	[REDACTED]	4/6/2012	[REDACTED]
Leasure,Phillip L.	GENERAL MANAGER	8/27/2001	[REDACTED]
M[REDACTED],Pedro	[REDACTED]	7/27/2012	[REDACTED]
R[REDACTED],JERRI [REDACTED]	[REDACTED]	8/20/2015	[REDACTED]
S[REDACTED],MATTHEW [REDACTED]	[REDACTED]	7/31/2015	[REDACTED]
S[REDACTED],Paul	[REDACTED]	11/24/2006	[REDACTED]
Tinney,Jeffery L.	CAPTAIN	1/7/2005	[REDACTED]

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